

February 28, 2006

U.S. Dept. of the Interior
Minerals Management Service

Sent via email to rules.comments@mms.gov

RE: ANPR Alternate Energy-Related Uses on the OCS 1010-AD30

Attn: Rules Processing Team:

We offer the following preliminary thoughts and concerns for your consideration.

Practical matters regarding leasing for activities that produce or support production, transportation, or transmission of energy from sources other than oil and gas.

1. Comprehensive analyses on number of activities necessary and where such activities might best be located really should precede the processing of applications or lease agreements to industrialize our oceans. This approach might be somewhat similar to the five year OCS leasing program. It should focus on matching the issuance of leases with demonstrated need and best locations. In addressing best locations, factors would include onshore infrastructural capacity (i.e., capacity of the grid at various locations to accept and transmit electricity from a new source) as well as environmental concerns, potential conflicts with other coastal uses, etc. Differently than five-year leasing programs for oil and gas, considerations of suitable locations also needs to ensure that appropriate onshore sites are not more suitable, considering environmental impacts, conflicts with other coastal uses, and economic viability.

2. We suspect that Coastal Management Programs are not geared to address consistency of these new types of activities and, therefore, may require a period of time and funding to amend these programs to ensure appropriate review under the consistency review provisions of the Coastal Zone Management Act.

3. Ensure such leases are prohibited within marine sanctuaries and federal ecological preserves. Also ensure that such leases are situated a sufficient distance from sanctuaries and preserves to avoid potential impacts and conflicts.

Practical matters regarding use , for energy-related or other authorized marine-related purposes, of facilities currently/previously used for activities authorized under the OCSLA.

1. For Santa Barbara County, this re-use applies to offshore oil and gas platforms and pipelines.

2. Substantial controversy continues to surround the concept of "rigs-to-reefs" offshore California, and the concept of converting these platforms to other uses after oil and gas operations have terminated. In response, the MMS established the Interagency Decommissioning Working Group to address issues and seek resolutions. This group should be tasked with completing its important work and submitting recommendations before re-use of oil and gas platforms in the POCS is addressed in rulemaking.

3. Comprehensive analysis of need for alternate uses, the best locations for these alternate uses, and the best and least intrusive type of facilities necessary to accommodate these alternate uses should precede consideration of converting specific platforms into other uses. Allow ample public input on the question of employing platforms for alternate activities in comparison to accommodating such activities in different locations or with substantially different facility design. This analysis should also address the structural integrity of platforms to accommodate the alternate uses beyond the originally conceived life (i.e., originally intended use) of the platforms and the capability of alternate users to properly maintain the platforms into the future, and should weigh benefits of removal against expanding economic lifetimes for alternate uses.

3. Should platforms be employed for alternate uses, requirements that the platform be removed at the end of its economic life should remain in-place, at least until scientific research establishes that converting a particular platform to a reef would provide regional benefit to rejuvenating fish populations with minimal conflict to other coastal uses. Appropriate financial assurances should be required of current owners to ensure timely removal at the end of operations, rather than passing liability onto new users.

4. Adverse impacts of leaving shell mounds behind at bottom of platforms after oil/gas operations have permanently ceased needs to be examined to ensure shell mounds do not contain toxic material that could leach into the ocean over time.

Respectfully submitted,

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